

Dear Ms. Neubecker:

This letter is to inform you that the following information is needed for your petition dated February 14, 2022 on behalf of Accurate Ag Spraying, LLC - (Docket FAA-2022-0218). This information is necessary for the Federal Aviation Administration (FAA) to process your petition.

In your petition, section A. Summary - You state: "The proposed operation in this Petition for Exemption is similar in nature to that currently conducted by Powers Flight Group, Exemption No. 18009, except...". In section M. Regulatory Basis, I. FARs Pertaining, 3rd paragraph - You further state: "In the Powers Flight Group Exemption, the FAA determined that the proposed UAS operations required exemption from FAR §§ 91.403(b)... certain conditions and limitations."

The Powers Flight Group Exemption (18009) does not grant relief from §91.403(b). The relief from §91.403(b) was first granted in the DroneXum, LLC Exemption (18413A).

In your petition, you did not request relief from Condition and Limitation 27(c) (operations closer than 500 ft. from non-participating persons, vessels, vehicles, and structures) as was granted in DroneXum, LLC Exemption (18413A).

Please clarify whether or not you meant to petition for relief from § 91.403(b) and C & L 27(c) based upon the DroneXum, LLC Exemption (18413A).

For this particular petition, Accurate Ag Spraying was not originally requesting relief from Condition and Limitation 27(c) based upon the DroneXum, LLC Exemption (18413A), but we were requesting exemption to § 91.403(b). In the past, if this particular exemption was not requested, the FAA would automatically add it to the decision and grant the relief.

For normal petitions with no special circumstances, Powers Flight Group is the petition normally referenced. However, since § 91.403(b) was not granted in the Powers Flight Group Petition, to reduce processing time, I will amend Accurate Ag Spraying's petition and include the relief from Condition and Limitation 27(c) based upon the DroneXum, LLC Exemption (18413A). I will also include the safety case.